

EXHIBIT 14

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP, in his personal capacity,

Defendant.

No. 20 Civ. 7311 (LAK) (JLC)

**DEFENDANT DONALD J. TRUMP'S SUPPLEMENTAL RESPONSES TO PLAINTIFF'S
FIRST SET OF INTERROGATORIES**

In accordance with Rules 26, 33 and 34 of the Federal Rules of Civil Procedure, the defendant, Donald J. Trump ("Defendant"), by and through his undersigned attorneys, Habba Madaio & Associates LLP, hereby submits the within Supplemental Response (the "Response") to the First Set of Interrogatories of Plaintiff, E. Jean Carroll ("Plaintiff") dated May 27, 2022 (the "Interrogatories").

This response is based on information now reasonably available, identifiable and/or knowable to Defendant. In addition, Defendant expressly reserves his right to supplement, amend, clarify, revise, and/or correct his response at any time. In addition, Defendant expressly reserves his right to assert any applicable objection, defense, immunity, or privilege, including without limitation, the attorney-client privilege, the work-product doctrine, the deliberative process privilege, executive privilege, the presidential communications privilege, and the Presidential Records Act, and Defendant submits this response subject to those privileges and immunities. Defendant further submits this response subject to any confidentiality order the Court may enter in this case.

PRELIMINARY STATEMENT & GENERAL OBJECTIONS

Defendant incorporates by reference the Preliminary Statement and General Objections set forth in Defendant's Responses and Objections to Plaintiff's First Set of Interrogatories dated July 13, 2022.

SUPPLEMENTAL RESPONSES AND OBJECTIONS TO INTERROGATORIES

2. Identify all individuals with whom You have communicated, by any means, concerning Plaintiff or this Action .

RESPONSE: In addition to the General Objections, Defendant objects to this interrogatory as exceeding the scope of Local Rule 33.3 because it seeks the identification of witnesses that do not possess "knowledge of information relevant to the subject matter of the action." Defendant further objects to this interrogatory because it is overly broad, vague, ambiguous, disproportionate, unduly burdensome, and does not adequately describe the information sought with reasonable particularity.

Furthermore, Defendant objects to this interrogatory to the extent that it seeks (i) communications or information protected by the attorney-client privilege; (ii) communications or information protected by the deliberative process privilege; (iii) communications or information protected by executive privilege; (iv) the presidential communications privilege; (v) the Presidential Records Act; (vi) communications or information protected under the Privacy Act; and (vii) any other applicable privilege.

Subject to and without waiving the foregoing objections and the General Objections, Defendant, to the best of his knowledge and recollection, recalls having communications with the following individuals who may possess knowledge of information relevant to the subject matter of the action in accordance with Local Rule 33.3:

(1) Dan Scavino

- (2) Nicholas Luna
- (3) Molly Michael
- (4) Hope Hicks
- (5) Derek Lyons
- (6) Jared Kushner

Dated: August 23, 2022
New York, New York

Respectfully submitted,



Alina Habba, Esq.

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To: Counsel of record via email